

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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<b>EBONY CHAMBERS,</b>	:
<b>In her own right and as Administratrix of the Estate of Rahsaan Chambers, deceased, et al.</b>	: <b>CIVIL ACTION</b>
	: <b>No. 23-0137</b>
	:
<b>Plaintiffs,</b>	:
	:
<b>v.</b>	:
	:
<b>CITY OF PHILADELPHIA, et al.,</b>	:
	:
<b>Defendants</b>	:
	:

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**STIPULATED ORDER COMPELLING  
PRODUCTION OF CERTAIN DOCUMENTS IN COMPLIANCE WITH HIPAA**

The parties, seeking to expedite discovery in this action, hereby stipulate that and seek the Court's approval and entry of this stipulated Order that:

- The City of Philadelphia, and any other party to this action, shall make production of any HIPAA protected health information (PHI) subject to an unchallenged or compelled discovery request in this action, and subject to the protections outlined in the Stipulated Protective Order, but without such PHI being destroyed at the completion of this litigation to the extent attorney litigation databases retain computer backup copies that are not reasonably destructible and are not generally accessible without technical intervention. This provision shall be without prejudice to any party to assert any other objection to production.
- The City of Philadelphia shall produce all Fire Department and EMT records related to the medical response to Rahsaan Chambers in April 2021.

- Except as outlined herein, all documents disclosed pursuant to this Order shall be subject to the terms of the Stipulated Protective Order and Stipulated Confidentiality Order.
- Upon approval by the Court, this Stipulated Order shall have the effect of an order of a court, as contemplated by 45 C.F.R. § 164.512(e)(1)(i), permitting disclosure under HIPAA.

Dated: May 10, 2024

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**SO ORDERED.**

Dated: This \_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_.  
\_\_\_\_\_  
Honorable Kai N. Scott